

RCRA Inspection Report

1) Inspector and Author of Report

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Enforcement and Compliance Assurance Division
Chemical Safety and Land Enforcement Branch
RCRA Enforcement Section
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2) Facility Information

Olin Corporation
411 County Road 101
Oxford, Mississippi 38655

EPA ID#: MSD053796736
NAICS #: 332992 – Small Arms Ammunition
Manufacturing
325920 – Explosives Manufacturing

3) Responsible Officials

Chris White
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4) Inspection Participants

Kenneth P. Rawls, Olin
Chris White, Olin
Casey Keel, Olin
Chris McCluskey, Olin
Julie Alvarez, Olin
Angela Mhoon, Olin
Randle Sutton, Olin
John Weeden, Olin
Bill Buskisk, Olin

Charlie Haley, Olin
Matt Vahle, Olin
Jared Flynn, Olin
Mae Carothers, Olin
Michael Helm, Olin
Brandon Burge, Olin
Bradley Justice, MSDEQ
Alan Newman, USEPA

5) Date of Inspection

August 29, 2024; 9:30 a.m. – 5:00 p.m. and August 30, 2024, 8:30 am – 5:00 p.m.

6) Applicable Regulations¹

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), and 40 Code of Federal Regulation (C.F.R.) Parts 260 - 270, 273, 278, &

¹ As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions will be to the authorized State program. However, for ease of reference, the federal citations will follow in brackets.

279; and Mississippi Code of 1972, Miss. Code Ann. § 17-17-1 *et seq.*, and Mississippi Hazardous Waste Management Regulations (MHWMR), 11 Miss. Admin. Code Pt. 3, R. 1.1-1.24.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.1 [40 C.F.R. § 260.10], a large quantity generator of hazardous waste (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.21 [40 C.F.R. § 273.9], a small quantity handler of universal waste (SQHUW) is a universal waste handler who does not accumulate 5,000 kilograms or more of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17], an LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 17-17-27(4) of the Mississippi Code of 1972, Miss. Code Ann. § 17-17-27(4) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 17-17-27(4) of the Mississippi Code of 1972, Miss. Code Ann. § 17-17-27(4) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area (SAA) conditions listed in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.2 [40 C.F.R. § 261.4(b)(18)], solvent-contaminated wipes, except for wipes that are hazardous waste due to the presence of trichloroethylene, that are sent for disposal are not hazardous wastes from the point of generation, provided that the conditions listed in 11 Miss. Admin. Code Pt. 3, R. 1.2 [40 C.F.R. § 261.4(b)(18)] are met (hereinafter referred to as the “Solvent-Contaminated Disposable Wipe Exclusion”).

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.2 [40 C.F.R. § 261.4(a)(26)], solvent-contaminated wipes that are sent for cleaning and reuse are not solid wastes from the point of generation, provided that the conditions listed in 11 Miss. Admin. Code Pt. 3, R. 1.2 [40 C.F.R. § 261.4(a)(26)] are met (hereinafter referred to as the “Solvent-Contaminated Reusable Wipe Exclusion”).

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Olin Corporation compliance with the applicable requirements of RCRA and the corresponding Mississippi regulations. This was an EPA lead inspection.

8) Facility Description

Olin Corporation (Olin) is a large quantity generator of hazardous waste, a generator of used oil, and a small quantity handler of universal waste. Olin manufactures ammunition for pistols, rifles, shotguns, and the firearms for the US military. Olin is a multinational company and operates two additional facilities in conjunction with the Mississippi facility in Illinois and Missouri. Olin operates its manufacturing facilities on 400 acres in Oxford, Mississippi, Lafayette County. Operations began in 2005 with the Rimfire manufacturing plant which was originally constructed in 1970 by the Emerson Electric Motor Division. The Rimfire manufacturing plant is approximately 150,000 ft². Olin constructed the Centerfire manufacturing facility in 2011 which included approximately 500,000 ft² underroof. Olin operates multiple support facilities including storage magazines for explosives, support buildings, and its own wastewater treatment plant. Olin's customer base is balanced between public consumers and government military contracts.

Cartridges are generally comprised of a shell casing, primer, powder, and bullet. Multiple cartridge sizes are manufactured by the following operations: metal drawing, annealing, capping, loading, bullet assembly, washing, and packaging.

Olin's manufacturing process is basically the same for all the Winchester Rimfire products: .17 HRM ammunition, .22, .25, .27, and for power tools. Brass or steel is sent to a press to create the casings. The casings are sent to a furnace and then to a tumbler. The cases are primed with high explosive material manufactured onsite and dried for seven days. Four basic lines are used in priming, with one dedicated solely to Winchester Rim-fire and the other three being product flexible. The primed cases are then sent to individual lines for completion with powder and bullets. The finished ammunition is packaged and sent to shipping and receiving for distribution. For the military packing lines, ammunition is received from centerfire operations. Olin packages the ammunition for use. A water-based paint is used to paint the tips of the 5.56 mm, 762, and 50 cal product lines.

The Centerfire operations generally follow the same manufacturing process as the Rimfire side. The metal manufacturing operations include a lead side and a brass side. Olin receives processed lead blocks which are converted to lead billets. The lead billets will then be processed into the lead for the ammunition. The brass side includes drawing out brass cups and adding a head stamp. The capper area consists of adding the priming cap to the ammunition. The loading room is where the gunpowder and lead bullet are added to complete the product prior to transferring it to the packing area for finalizing the ammunition for shipping. Both Rimfire and Centerfire plants include ballistics and testing areas.

The wastewater treatment plant includes a hazardous wastewater pretreatment plant and a non-hazardous wastewater pretreatment plant. The hazardous wastewater pretreatment plant has been installed since the plant opened in 2005, while the non-hazardous wastewater pretreatment plant was completed in 2011 with the expansion. Rimfire Operations wastewater and all the wastewater from the Explosives Manufacturing are sent to the hazardous wastewater pretreatment plant. Rimfire also sends Sanitary Wastewater, Non-Contact Cooling Water, and Boiler Blowdown to the Lafayette County Industrial Park (LCIP) POTW. Centerfire

Operations sends all their wastewater and boiler blowdown to the non-hazardous wastewater pretreatment plant. Sanitary wastewater and non-contact cooling water are also sent from the Centerfire plant to the LCIP POTW. The hazardous wastewater pretreatment plant treats approximately 56,000 gallons per day while the non-hazardous wastewater pretreatment plant treats approximately 444,000 gallons per day. The combined effluent from the two plants is merged in a surge tank and discharged via Outfall 001 to the Oxford POTW. Wastewater sludge from the Rimfire plant is disposed of as K046 hazardous waste. Olin employs approximately 1,300 workers and 80 contract workers at their manufacturing locations in Oxford, Mississippi.

Security to the site is controlled by an enclosed fence, passkeys for workers and visitors, a contract security company staffing the entrances. Olin last notified the State of Mississippi of their hazardous waste activity on February 22, 2024.

The following waste were generated by Olin at the facility in 2023.

Waste Stream	EPA Waste Codes	Amount generated in 2023 (pounds)
Scrap Smokeless Powder (in water)	D008, D030, D003	144,529
Cartridges for powder devices (Pat rounds)	D008	6,541
Priming mix contaminated debris	D002, D001, D003, D008	62,977
Powder contaminated solvent and oil	D001, D008, D030, F002, F003	4,177
Waste water treatment sludge cake	D008, K046	235,540
Paint and Solvent waste	D001, D007, D008, F002, F003	13,085
Combined lead contaminated material	D004, D008	275,120
Mercury Contaminated Debris	D009, D008	5,516
Mercurous nitrate solution	D001, D002, D009	897
Sump Tank cleanout Sludge	D007, D008	17,540
Mouth water Proofing Scrap	D008	2,984
Lead Contaminated baghouse dust	D008	2,197
Live Rounds	D001, D003, D008	5,130
Paint, solvent rags, paper clean up debris	D001	835
Loaded rounds up to 40 cal w/mercury	D001, D003, D008, D009	43,280
Lead contaminated waste wax	D008	2,209
Lead contaminated baghouse dust with water	D002, D008	938
Lead contaminated ductwork	D008	8,600
Ballistic media	D008	21,520
Lithium batteries	D003	20

Nickel Cadmium batteries	D006	13
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Olin ships its waste the following TSDFs: Veolia Technical Solutions, LLC [ILD098642424], Chemical Waste Management, Inc. [ALD000622464], Heritage Environmental Services, LLC [IND093219012], Heritage Thermal Services Inc. [OHD980613541], and Rineco Chemical Industries LLC [ARD981057870]. Olin operates under a stormwater permit, a synthetic minor air permit, and a pre-treatment permit which discharges into the Oxford POTW.

9) Previous Inspection History

MSDEQ conducted two RCRA CEIs at the subject facility since 2013 and found no violations during those inspections, including the most recent inspection on March 20, 2018.

10) Opening Conference

On August 29, 2024, EPA inspector Alan Newman, accompanied by MSDEQ inspector Bradley Justice, arrived at Olin Corporation at approximately 9:30 am. Kenneth Rawls, Senior Associate Environmental Specialist, immediately received the inspectors. Kenneth Rawls, and the inspectors were joined by Chris White, for the opening conference. The inspectors introduced themselves, showed their credentials to Kenneth Rawls and Chris White, and explained the purpose of the visit.

The inspectors described the anticipated use of a digital camera during the inspection and provided a request for records. The EPA inspector explained that the Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. Facility representatives stated they did not operate as a small business. The EPA inspector also discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to EPA. The company did not assert a business confidentiality claim.

Kenneth Rawls and Chris White provided an overview of the facility's history and current operations during the opening conference. The inspection participants also discussed health and safety protocols and required personal protective equipment before Facility representative led the inspectors on a tour of the Facility operations.

11) Inspection Observations

Centerfire:

The inspection team toured through each area of the Centerfire facility. In the drawing and annealing area, near I-beam E6, the inspection team noted one 55-gallon black container with a red flip top lid used to accumulate Excluded Solvent-Contaminated Wipes (ESCWs) for acetone. This container was in good condition, labeled, and closed (Photograph 1). There was no date on

this container. Facility personnel stated that this waste is laundered by a contractor. Olin did not appear to be documenting how long this waste had been accumulating.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.2 [40 C.F.R. § 261.4(a)(26)(v)(B)], generators must maintain at their site documentation that the 180-day accumulation time limit in 40 CFR 261.4(a)(26)(ii) is being met.

At the Centerfire Progressive Die Area, Olin was storing four containers of used oil (Photographs 2-3). One container was affixed with a funnel with used oil draining into the funnel from a 5-gallon white plastic container. The inspection team noted used oil on top of the container. These containers were not all labeled as used oil. On the floor next to these containers of used oil, the inspection team noted some rags. They appeared to be soaked through. Facility representative moved these rags to an appropriate container. Olin documented compliance in this area in an email dated September 13, 2024.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.22 [40 C.F.R. § 279.22(d)(3)], generators of used oil upon detection of a release of used oil to the environment must perform the following cleanup steps: clean up and manage properly the released used oil and other materials.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.22 [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words “Used Oil.”

The inspection team also noted a metal screen on top of an open 5-gallon container accumulating waste (Photographs 4-5). This container was lined with plastic and partially filled with water. Facility representatives stated that this container was accumulating energetics or primer scrap to be recycled on site. The label on this container reads: “Scrap Primers in Water (Interm.) Danger.” This label also indicated it was explosive, a health hazard, an irritant, and for aquatic toxicity. Quality rejected parts, damaged casings, and turnings are recycled onsite.

Capper Area

In the capper area, shell casing is pierced through and primer added to middle of cartridge base. Lacquer seals are applied to ensure they are waterproof. The inspection team noted some aerosol cans being used in the capping process. Olin manages aerosol cans as hazardous waste with multiple can puncturing SAA locations.

Near Capper 16 machine, Olin was storing two 55-gallon containers accumulating ESCWs which were labeled “Excluded Solvent Contaminated Wipes for Laundry Service Shop Towels Only No Rags No Trash” that were not closed (Photographs 6, 8). These containers were not dated and the lid for these containers did not appear to be in full contact with the rim. The inspection team considered these containers open. Adjacent to these ESCW containers, Olin was storing two 55-gallon containers accumulating hazardous waste rags. These containers were labeled “Contaminated Rags ONLY No Trash No Shop Towels” (Photographs 6-7). Facility personnel stated that these rags are managed as hazardous waste and not laundered. There was more than 55 gallons of waste in this SAA. One of these containers was not labeled as hazardous waste. One of these containers was equipped with a locking lid that was not locked and the lids

was warped such that it did not make contact with the entire rim of the container. The sign on the wall above these containers reads: "Keep Lids Latched." One of these containers was dented and the waste from the container had not moved into a container in good condition or placed the dented container in an overpack. One container was labeled with a DOT Miscellaneous 9 indicator. This label does not meet the RCRA requirement for identifying the indication of the hazard on the container. The inspection team noted that neither container of hazardous waste was labeled with an indication of the hazard. Olin documented compliance in this area in an email dated September 13, 2024.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.2 [40 C.F.R. § 261.4(a)(26)(v)(B)], generators must maintain at their site documentation that the 180-day accumulation time limit in 40 CFR 261.4(a)((26)(ii) is met.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.2 [40 C.F.R. § 261.4(a)(26)(i)], during accumulation, a container is considered closed when there is complete contact between the fitted lid and the rim, except when it is necessary to add or remove solvent-contaminated wipes.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)], which is a condition of the SAA Permit Exemption, a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near any point of generation where wastes initially accumulate which is under the control of the operator of the process generating the waste, without a permit or interim status provided that all of the conditions for exemption in this section are met.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(1)], which is a condition of the SAA Permit Exemption, if a container holding hazardous waste is not in good condition, or if it begins to leak, the generator must immediately transfer the hazardous waste from this container to a container that is in good condition and does not leak, or immediately transfer and manage the waste in a central accumulation area.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a container holding hazardous waste must be closed at all times during accumulation when adding, removing or consolidating waste.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(5)(i-ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its container with the following: the words "Hazardous Waste" and an indication of the hazards of the contents.

Loading

The inspection team noted in the loading area similar waste accumulation 5-gallon buckets. The tops were covered with a screen and the buckets were lined with plastic and partially filled with water. Olin representatives stated that there were approximately 50 of these containers, one next to each loading operation and at the quality station (Photographs 9-12). These containers were labeled as hazardous waste and with and explosive indication of the hazard. These containers were not labeled with a toxic indication of the hazard and were labeled with an EPA

waste code of D008 that corresponds to Lead. All of these containers were open. These SAA containers should be operated with as closed containers except when adding or removing waste. Similar waste accumulations containers were in the Quality station in this area.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a container holding hazardous waste must be closed at all times during accumulation when adding, removing or consolidating waste.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its container with the following: an indication of the hazards of the contents.

Mercury Regeneration Laboratory

The inspection team noted three red overpack containers each with a 5-gallon white plastic container inside (Photographs 13-14). Each over pack was labeled as hazardous waste (D001/D003/D008/D009) and with an explosive indication of the hazard but was not labeled as Toxic. Additionally, there was one black 55-gallon metal container storing hazardous waste for gloves, paper, deli trays, and used hot plates (D008/D009). These containers were labeled as hazardous waste but were not labeled with all the indications of the hazards (Photographs 14-16). The lid on this container was ajar when the inspection team entered the laboratory.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a container holding hazardous waste must be closed at all times during accumulation when adding, removing or consolidating waste.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its container with the following: (ii) an indication of the hazards of the contents.

On the opposite side of this laboratory, Olin personnel test products for quality. Waste material is generated and staged in one of three white plastic buckets subsequent to the quality testing. These three containers were labeled as Mercury contaminated material (Photographs 17-18). The staged waste is later sorted into other 5-gallon white plastic containers. These staged containers were in good condition and closed. The three staged containers were not labeled as hazardous waste or with an indication of the hazard.

The four containers that the staged waste is transferred into were each labeled as hazardous waste (D001/D003/D008/D009) and in good condition (Photographs 19-21). The labels did not accurately include all the indications of the hazards. One of these containers was over full such that the lid could not be closed (Photograph 21). Additionally, there was a tray of waste on top of this container that was open, not labeled with the words hazardous waste or with the indication of the hazard (Photograph 21).

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a container holding hazardous waste must be closed at all times during accumulation when adding, removing or consolidating waste.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(5)(i-ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its container with the following: (i) the words “Hazardous Waste” and (ii) an indication of the hazards of the contents.

In one work area, there was a plastic-lined 5-gallon white plastic accumulation container that is used to initially accumulate gloves and paper at a specific workstation (Photograph 22). According to facility representatives, this container is emptied into the 55-gallon container in this room. The label on this container (D001/D002/D009 – Nitric Acid, oxidizer - Lead Styphnate) did not match the label on the 55-gallon container. Olin representatives stated that this container should have been relabeled and was not. Olin has a potential to exceed 55 gallons of this waste in this laboratory. This container was empty on the day of the inspection. This is an area of concern for the inspection team. Olin was operating a sample waste accumulation 5-gallon container in this laboratory (Photograph 23). This container was labeled (D001/D008/D009), in good condition, and closed.

Bullet Assembly/Rifle Cells

Near I-Beam E19, Olin was accumulating ESCWs in a 5-gallon red container that was dented (Photograph 24). Olin had not transferred the waste to another container. This is an area of concern. There was no documentation to ensure the 180-day accumulation time limit is being met.

Near I-Beam F19, Olin was managing four waste containers (Photographs 25-29). One 55-gallon black metal container was labeled as “Aerosol Can Puncturing Station #6” (F002/F003/D001/D008/D007). This container was labeled, in good condition, and closed. The second container was accumulating punctured aerosol cans but was open and not labeled. The inspection team recommends that all containers of waste be labeled as to their contents. The other two containers were accumulating ESCWs. These containers were labeled but one was open because there was a missing bung hole plug (Photograph 29). There was no documentation to ensure the 180-day accumulation time limit is being met.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.2 [40 C.F.R. § 261.4(a)(26)(v)(B)], generators must maintain at their site documentation that the 180-day accumulation time limit in 40 CFR 261.4(a)((26)(ii) is met.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.2 [40 C.F.R. § 261.4(a)(26)(i)], during accumulation, a container is considered closed when there is complete contact between the fitted lid and the rim, except when it is necessary to add or remove solvent-contaminated wipes.

CAA 2-03 – The Leadworks

In CAA 2-03, Olin was managing waste in two red hoppers that were approximately 200 gallons capacity (Photographs 30-32). These hoppers were labeled as D008 hazardous waste and with accumulation start dates of 7/24/2024 and 7/15/2024. These containers were in good condition with one open and in use and the other one closed. Neither of these containers were labeled

with the indication of the hazard. This area was equipped with a fire extinguisher and a spill kit. There was no decontamination equipment in this area such as an eye wash.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the LQG Permit Exemption, a large quantity generator must mark or label its containers with the following: an indication of the hazards of the contents.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(6)] which references 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.252(c)], which is a condition of the LQG Permit Exemption, a large quantity generator may determine the most appropriate locations within its facility to locate equipment necessary to prepare for and respond to emergencies: Portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment.

Baghouse SAA Leadworks

The inspection team noted two 55-gallon containers underneath baghouses accumulating waste (Photographs 33-37). These containers were labeled as D002/D008 hazardous waste and with a corrosive indication of the hazard. However, these containers also contained toxics which were not included on the indication of the hazard label.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its container with the following: an indication of the hazards of the contents.

CAA 2-02 Packing

Olin was generating hazardous waste in the packing area and accumulating this waste in one 200-gallon red hopper labeled as D004/D008 hazardous waste (Photographs 38-39). This container was also labeled with a DOT label for miscellaneous waste 9. This label does not meet the requirement for RCRA indication of the hazard labeling. The hopper was labeled with an accumulation start date of 8/26/2024. This area was equipped with a fire extinguisher and a spill kit. There was no decontamination equipment in this area such as an eye wash. There was one 5-gallon SAA container used to accumulate explosive waste near Packing column K15. This container was labeled (D003/D008/D030), in good condition, and closed (Photograph 40). This container was not labeled with an indication of the hazard to include toxic for lead.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the SAA Permit Exemption, a large quantity generator must mark or label its containers with the following: an indication of the hazards of the contents.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(6)] which references 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.252(c)], which is a condition of the SAA Permit Exemption, a large quantity generator may determine the most appropriate locations within its facility to locate equipment necessary to prepare for and respond to emergencies: Portable fire extinguishers, fire control equipment (including special extinguishing

equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(5)(ii)], a generator must mark or label its container with the following: an indication of the hazards of the contents.

Magazine #2 - CAA 2-04

Olin was storing one hundred and twenty-one (121) 5-gallon containers in this area. Each container was in good condition, labeled (D003/D008/D030), and closed (Photographs 41-44). Olin was storing these 5-gallon containers stacked three containers high in four rows. The aisle space between the rows was determined to be insufficient. The oldest accumulation start date was 6/12/2024 (Photograph 44). The inspection team noted that 38 of these containers were marked with an insufficient accumulation start date due to the absence of the year. This is an area of concern for the inspection team. Each container was labeled with an explosive indication of the hazard; however, the waste was described as D008 in addition to the explosive hazard which would require an additional indication of the hazard of toxic.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(6)] which references 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.255], a large quantity generator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(5)(i)(B)], a large quantity generator must mark or label its containers with the following: an indication of the hazards of the contents.

CAA 2-05 HazMat Building

Olin was accumulating D004/D008 hazardous waste in a 30-yard roll off container in the HazMat Building (Photographs 45-48). This container was in good condition and labeled as hazardous waste and with the accumulation start date of 8/16/2024. This container was labeled with a DOT placard with the 3077 code which stand for environmentally hazardous substance. This labeling does not meet the RCRA requirement for labeling the container with the indication of the hazard. The tarp on top of this container was not fully covering the container and was considered open (Photograph 47).

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(1)(iv)(A)], which is a condition of the LQG Permit Exemption, a container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the LQG Permit Exemption, a large quantity generator must mark or label its containers with the following: an indication of the hazards of the contents.

CAA 2-01 HazMat Building

In the HazMat Building, there was a locked chain-link fenced-in area. Olin was operating CAA 2-01 for storage of multiple waste streams in this CAA. Olin was storing three cardboard containers of universal waste lamps (Photograph 49). Each container was in good condition, closed and marked with an accumulation start date. The oldest accumulation start date for these containers was 2/5/2024.

Olin was storing 77 5-gallon white plastic containers in this area (Photographs 50-53). Of these containers, 76 were labeled as D001/D003/D008/D009 hazardous waste, and one was labeled as D001/D002/D009 mercury samples; each container was labeled with an explosive indication of the hazard but did not include the toxic indication of the hazard. The oldest accumulation start date of these containers was 7/10/2024. There was insufficient aisle space in this CAA. Several of the container labels were not facing the aisleway.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(6)] which references 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.255], which is a condition of the LQG Permit Exemption, a large quantity generator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the LQG Permit Exemption, a large quantity generator must mark or label its containers with the following: an indication of the hazards of the contents.

Olin was storing eight 55-gallon containers of used oil in CAA 2-01 (Photograph 52). Seven containers were labeled as used oil; one was not labeled. Each container was in good condition. Olin should ensure that each container of waste is labeled as to its contents.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words “Used Oil.”

Olin was storing six 55-gallon containers of hazardous waste in CAA 2-01 (Photograph 53). There were five containers of D008/D009 hazardous waste with an oldest accumulation start date of 8/2/2024 and one 55-gallon container of waste paint (F002/F003/D008/D007) with an accumulation start date 8/14/2024. None of these containers were labeled with an indication of the hazard. There was waste on top of the waste paint container; the facility had not responded to the release of this waste.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the LQG Permit Exemption, a large quantity generator must mark or label its containers with the following: an indication of the hazards of the contents.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(6)] which references 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.251], which is a condition of the LQG Permit Exemption, a large quantity generator must maintain and operate its facility to minimize the

possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Battery Accumulation Area HazMat Building

Along one wall of the HazMat Building, Olin was storing sorted batteries including Lithium, NiCad, alkaline, and other types in red foot pedal, overpack containers with white 5-gallon containers inside (Photograph 54). Each container was in good condition, closed, and labeled. The oldest accumulation start date was 2/12/2024.

Area Outside of Loading

In the area along outside wall of loading manufacturing area, Olin was operating two acetone parts washers and one blue metal 55-gallon SAA container for waste acetone (Photograph 55-56). This container was not labeled on the day of the inspection. This container was affixed with a funnel. The funnel was not latched and there was no gasket to seal the lid of the funnel to the rim. Therefore, the inspection team considered this container open. The inspection team noted a distressed area of grass where the drain downspout from the roof flows into the grass (Photograph 57). This is an area of concern for the inspection team. Olin should investigate to determine the cause of the stressed vegetation. Olin documented compliance in this area in an email dated September 13, 2024.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(5)(i-ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its container with the following: the words “Hazardous Waste” and an indication of the hazards of the contents.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a container holding hazardous waste must be closed at all times during accumulation when adding, removing or consolidating waste.

Joint Facility Wastewater Treatment Plant (WWTP)

CAA 1-03

Olin operates a WWTP where waste from the entire facility is treated in two parallel treatment paths. Waste waters from Rimfire and the High Explosives area are treated in one treatment path which results in hazardous filter cake K046/D008. The other treatment path for Centerfire results in a non-hazardous filter cake. The Rimfire/High Explosive waste filter cake is accumulated in a 30-yard box that was labeled with an accumulation start date of 8/9/2024 and the words hazardous waste (Photograph 58-59). There was no indication of the hazardous on this container.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the LQG Permit Exemption, a large quantity generator must mark or label its containers with the following: an indication of the hazards of the contents.

High Explosives Building

Olin constructed the high explosive building in approximately 2004. When operating, Olin utilizes water sprayed into the production areas to increase humidity (60-90%) and lessen the probability of ignitability. Waste generated during production is washed to a central sump which drains to a clarifier. The wastewater is dewatered and treated to deactivate the material by adding caustics, aluminum, and heat. Deactivated wastewaters are pumped to the wastewater treatment plant for further treatment to meet the pre-treatment permit prior to discharge to the POTW. Some solids are generated during production operations and are accumulated in a 55-gallon black container with a red flip top lid (Photograph 60). The SAA container was in good condition, closed, and labeled as hazardous waste. The container was labeled with an explosive indication of the hazard; the container was also labeled with the EPA waste codes: D001/D002/D003/D008. Olin does not appear to be including all the pertinent indication of the hazards on this container.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its container with the following: (ii) an indication of the hazards of the contents.

Rimfire

South Dock Rimfire - CAA 1-02

Olin was storing seventeen containers of hazardous waste in CAA 1-02 on the South Dock of Rimfire (Photograph 61). Six were 5-gallon containers of hazardous waste that area labeled with an explosive indication of the hazard and with the waste codes D001/D003/D008. The other eleven were 55-gallon containers of hazardous waste including nine containers labeled as Lead Styphnate which were also labeled with an explosive indication of the hazard and with the EPA waste codes D001/D002/D003/D008, and two containers labeled with an explosive indication of the hazard and with EPA waste code D008. The inspected team determined that there was insufficient aisle space in this area. These containers were in good condition and closed. The oldest accumulation start date on these containers was 7/12/2024. Olin does not appear to be including all the pertinent indications of the hazards on these containers.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(6)] which references 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.255], which is a condition of the SAA Permit Exemption, which is a condition of the LQG Permit Exemption, a large quantity generator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the LQG Permit Exemption, a large quantity generator must mark or label its containers with the following: an indication of the hazards of the contents.

Primer Mix Area

Table for Sorting

Olin sorts metal waste parts for salvage at a table in the Primer Mix Area (Photograph 62). Sorted parts are placed into one of four 55-gallon black metal salvage containers for reclamation under scrap metal exemption (Photograph 63). Underneath the sorting table the worker utilizes a 5-gallon white SAA container with a screen on the top to accumulate hazardous waste energetics. This container was considered to be open. The worker in this area was constantly adding waste to this open container. This SAA container was labeled as hazardous waste and with an explosive indication of hazard.

There were four 55-gallon containers and one 5-gallon container with a screen top used to store hazardous waste in the Primer Mix Area (Photographs 64-68). There appears to be more than 55 gallons of waste in this area. Facility personnel stated that this waste is generated in the adjacent production area (point of generation). Olin needs to evaluate if this area should be managed as a CAA or whether these containers could be moved to the point of generation.

One 55-gallon container of hazardous waste was used to accumulate sponges, rags, plastic, mopheads, and clean up waste (D001/D002/D003/D008). This container was open, labeled as hazardous waste, and labeled with an explosive indication of the hazard. The second 55-gallon container of hazardous waste was used to accumulate mercury scrap and was labeled as hazardous waste and with a toxic indication of the hazard. The 5-gallon container will be utilized to accumulate smokeless powder, a hazardous waste (D003/D008/D030). This container was newly added and empty on the day of the inspection. This container should include all indications of the hazard once it begins accumulating waste. The third 55-gallon container of hazardous waste was used to accumulate strips from loading rounds (D008). This container was labeled as hazardous waste and with an explosive indication of the hazard. The fourth 55-gallon container of hazardous waste was accumulating contaminated oil (F002/F003/D001/D008/D030) and was labeled as hazardous waste and with a flammable liquid indication of the hazard. This container was affixed with a funnel that was not threaded into the bung hole. The inspection team considered this container open. Many of these containers do not appear to include all the appropriate indications of the hazards for this waste.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)], which is a condition of the SAA Permit Exemption, a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near any point of generation where wastes initially accumulate which is under the control of the operator of the process generating the waste, without a permit or interim status provided that all of the conditions for exemption in this section are met.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a container holding hazardous waste must be closed at all times during accumulation when adding, removing or consolidating waste.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its container with the following: an indication of the hazards of the contents.

SpinPrime

In the SpinPrime area, Olin fills holes in a metal plate with primer. The plate is loaded into the SpinPrime manufacturing machine which spins the primer into the shell casing's cavity. Similar to other areas of the facility, Olin accumulates primer waste in 5-gallon containers partially filled with water which are affixed with screened tops. These containers are labeled as hazardous waste, open, in good condition, and labeled with an explosive indication of the hazard. These containers do not appear to include all the appropriate indications of the hazards for this waste. While accumulating in 5-gallon containers, wastes are managed as hazardous waste.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a container holding hazardous waste must be closed at all times during accumulation when adding, removing or consolidating waste.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its container with the following: (ii) an indication of the hazards of the contents.

Waste waters generated in 5-gallon containers in this area are poured into the sump. Personnel kill accumulated material weekly in deprime using an ultrasonic cleaner. The deprime area is operated weekly or as needed. The resulting wastewaters are pumped to the wastewater treatment plant for further treatment to meet the local POTW limits.

Progressive Dye

Olin manufactures shells in the Progressive Dye/Annealing areas using drawing and mechanical manipulation operations. Olin was operating a can puncture device #5 affixed to a 55-gallon blue SAA container (Photograph 69). This container was labeled with the words hazardous waste and with a Flammable Solid indication of the hazard. This container appears to be storing liquid waste. Adjacent to this container, Olin was accumulating punctured cans in a 55-gallon black container. The inspection team noted spilled paint on the container, the floor, and on the wall in this area. Spilled material should be cleaned up when spilled.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(7)] which references 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.251], which is a condition of the SAA Permit Exemption, a large quantity generator must maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

CAA 1-07

Olin was storing combined lead contaminated hazardous waste (D004, D008) in a roll off container on the northeast corner of the Rimfire building at CAA 1-07 (Photographs 70-72). The container was in good condition, closed, and labeled with an accumulation start date of 6/21/2024. The container was labeled as hazardous waste but was not labeled with an indication of the hazard. The inspection team noted waste on the floor and on the platform adjacent to the roll off container (Photographs 73-74). Spills of hazardous waste should be immediately remediated.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the LQG Permit Exemption, a large quantity generator must mark or label its containers with the following: an indication of the hazards of the contents.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(6)] which references 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.251], which is a condition of the LQG Permit Exemption, a large quantity generator must maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

CAA 1-05

CAA 1-05 was in a three-sided metal shed with a concrete floor along the north side of the Rimfire manufacturing facility. Olin was storing two 200-gallon red hoppers of used tumbling media (D004, D008) and two blue 55-gallon containers of paint waste (F002, F003, D001, D008, D007) in CAA 1-05 (Photographs 75-80). The red containers were labeled as hazardous waste and with the accumulation start dates of 7/27/2024 and 8/1/2024. One of the red hoppers was open on the day of the inspection; the lid of the hopper was warped and did not touch the hopper all the way around the rim. Neither of the red containers was labeled with an indication of the hazard. The blue containers were labeled as hazardous waste and with accumulation start dates of 8/1/2024 and 8/23/2024. One container was affixed with a locking funnel and did not have a bung cap in the small bung hole (Photograph 77). Facility personnel inserted a bung cap during the inspection. Both blue containers were labeled with Flammable Liquid indication of the hazard labels but were not labeled as toxic due to possible presence of lead and chrome. The blue container without the funnel had pooled waste on top of the container (Photograph 77). Spills of hazardous waste should be remediated immediately.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(1)(iv)(A)], which is a condition of the SAA Permit Exemption, a container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the SAA Permit Exemption, a large quantity generator must mark or label its containers with the following: an indication of the hazards of the contents.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(6)] which references 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.251], which is a condition of the SAA Permit Exemption, a large quantity generator must maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

CAA 1-06

Olin was storing hazardous waste (D004/D008) in one red 200-gallon container on the day of the inspection in CAA 1-06 (Photograph 81-84). The container was labeled as hazardous waste and with an accumulation start date of 8/28/2024. The container was labeled with a DOT – miscellaneous 9 label. This label does not satisfy the RCRA indication of the hazard requirement. The lid of this container was warped such that it was unable to be closed.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the SAA Permit Exemption, a large quantity generator must mark or label its containers with the following: an indication of the hazards of the contents.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(1)(iv)(A)], which is a condition of the SAA Permit Exemption, a container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste.

9mm NATO Peen Tumbler

Olin was operating a Peen Tumbler manufacturing machine that was processing parts. This machine had a catch basin in the bottom to collect waste from the process. This catch basin appeared to be an integral part of the unit (Photograph 85). The inspection team determined that this was a part of the manufacturing process unit. This tray would not need to be labeled as hazardous waste. Once the waste is removed from the process unit, Olin becomes responsible for making a waste determination for this waste and appropriately managing it. A previous inspector recommended a hazardous waste label be added to the machine.

CAA 1-01

Between the Rimfire building and the high explosive building, Olin was storing hazardous waste (D003/D008/D030) in a separate storage building which was designated as CAA 1-01. At the time of the inspection, there were sixty-four (64) 5-gallon containers lined up three high along a wall (Photograph 86-87). The containers were storing Smokeless Powder hazardous waste and the oldest accumulation start date was 8/15/2024. All containers were labeled as hazardous waste and sixty-three were labeled with an explosive indication of the hazard. One container was not labeled with an indication of the hazard. The indication of the hazard labeling does not include the label for toxic (D008 – Lead).

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the SAA Permit Exemption, a large quantity generator must mark or label its containers with the following: an indication of the hazards of the contents.

12) Records Review

Contingency Plan and Quick Reference Guide (QRG):

The actions that facility personnel should take in response to an emergency are described in the facility's Hazardous Waste Contingency Plan, which was last updated on August 9, 2024.

The plan describes actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

The plan describes arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or the Local Emergency Planning Committee.

The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators. Shift Maintenance Foremen Alex McCachren, Kerby Ladner, and Shannon McDonald are listed as the primary emergency coordinators, and the other individuals are listed in the order in which they will assume responsibility as alternates.

The plan includes a list of all emergency equipment at the facility. The list includes fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. The list appears to be up to date. The plan does not include the location and a physical description of each item on the list, and a brief outline of its capabilities. The map provided with emergency equipment locations is difficult to read.

The plan includes a partial evacuation plan for personnel. The plan does not include an evacuation figure for the high explosive building or Assembly Areas for Rimfire. This plan partially describes signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

During the review of the contingency plan, in Section 5.1, a reference is made to outdated regulations. Instead of "40 CFR 265.1b (a)(2)", the plan should reference 40 C.F.R. § 262.17(a)(7).

A copy of the Hazardous Waste Contingency Plan (and its quick reference guide (QRG)) was most recently submitted to the City of Oxford Fire Department, the Office of Pollution Control, the Lafayette County Emergency Management, Homeland Security Coordinator, the Lafayette County Fire Department, the Oxford Police Department, the Lafayette County Sheriff's department, and the Baptist Memorial Hospital – North Mississippi on August 9, 2024.

The QRG reviewed on the day of the inspection did not include 2) the estimated maximum amount of each hazardous waste that may be present at any one time, 4) a map of the facility showing where hazardous wastes are generated, accumulated, and treated and routes for accessing these wastes; 5) a street map of the facility in relation to surrounding businesses, schools and residential areas; 7) and the identification of on-site notification systems. Additionally, Olin has referenced the maps in the contingency plan in the QRG. The QRG should be a standalone document.

On September 13, 2024, Olin submitted an updated Contingency Plan. The updated plan does not yet include all the required information in a legible format. Specifically, the symbols added to the Rimfire map are indecipherable between the multiple items identified in the legend. All the added information is one color, red. The added locations are so small that the detail of the legend item is unreadable. Evacuation routes from the High Explosives building are as yet unidentified on the figure. The estimate maximum amounts of waste on site are listed as “Various” associated with containers sizes for each waste stream in the QRG. This is an indefinite maximum amount.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(6)], which references 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.261(e)], which is a condition of the LQG Permit Exemption, the contingency plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(6)], which references 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.261(f)], which is a condition of the LQG Permit Exemption, the contingency plan must include an evacuation plan for generator personnel where there is a possibility that evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires).

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(6)], which references 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.262(b)], which is a condition of the LQG Permit Exemption, an LQG that is amending its contingency plan to submit a quick reference guide of the contingency plan to the local emergency responders. The required contents of the quick reference guide are specified in [11 Miss. Admin. Code Pt. 3, R. 1.3] [40 C.F.R. § 262.262(b)]. The quick reference guide must include the following elements: (4) A map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; (5) A street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers.

Training Records:

The inspectors reviewed facility job descriptions and employee names that were provided for dozens of facility job titles including Safety Coordinator, SHE Supervisor, Prod/Utility Opr-Assemble & Pk, Rimfire Operations Supt., High Explosives operator, SH&E and Maintenance Director, Fen Supv. Maintenance, Supv. Maintenance, Rimfire Mtc & Wastewater Supv. Each description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position. Jared Flynn, Kerby Ladner, Samuel McCachren, Shannon McDonald, each received training in 2024 subsequent to the inspection. The records for these four employees for 2023 and 2022 were not specific enough to determine if they had received

annual training. Olin stated in the email from September 13, 2024, that the vagueness was due to a change in the software used to track training dates.

Olin provided a written description of the type and amount of both introductory and continuing training to be given to each person filling the positions listed above. Generally, multiple job titles receive annual training. The inspectors reviewed records of employee hazardous waste training completed in 2024. The inspection team asked to see a copy of the training that makes up the "Site Specific RCRA Training". This information has not yet been provided.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(7)(iii)], which is a condition of the LQG Permit Exemption, facility personnel must take part in an annual review of the initial training required in paragraph (a)(7)(i) of this section.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(7)(i)(C)], which is a condition of the LQG Permit Exemption, at a minimum, the training program must be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including where applicable: (1) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment; (2) Key parameters for automatic waste feed cut-off systems; (3) Communications or alarm systems; (4) Response to fires or explosions; (5) Response to ground-water contamination incidents; and (6) Shutdown of operations.

Waste Manifest and Land Disposal Restriction (LDR) Records:

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent since 2021. The recent TSDs utilized for disposal included Heritage Environmental Services in East Liverpool, Ohio (OHD980613541), and in Indianapolis, Indiana (IND093219012), and Chemical Waste Management (ALD000622464). There were no deficiencies noted with these records. The most recent shipment was made on August 9, 2024.

Weekly Inspection Records:

The inspectors reviewed Olin's available records of inspections of the hazardous waste central accumulation area (CAA) since 2021 via the online system. The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. The inspection log includes a checklist to record observations about aisle space, visible container labels, legible container labels, complete container labels, closed lids and bungs, condition of containers, posted danger signs, emergency communication, emergency response equipment, the oldest date on container inventory, and available fire extinguisher. The records include the date and time of the inspection and the name, signature and initials of the employee conducting the inspection. Employees do routinely record inspection observations and subsequent follow-up actions on the inspection log.

Other Records

The inspection team reviewed the annual reports, hazardous waste reduction plan, and several waste profiles. There were no issues noted with these documents.

The inspection team requested documentation of the most recent shipment for each universal waste (lamps, batteries, etc.) and used oil. The inspection team has not received these records yet.

13) Closing Conference

The inspectors conducted the exit meeting at 4:33 pm with Kenneth Rawls, Cindy Fernandez, Steve Baymiller, and Chris White. During this meeting, the inspectors stated their preliminary conclusions of the inspection. Olin agreed to provide photographs of corrected issues, the most recent shipping documentation for each category of universal waste including lamps and batteries within 30 days. On September 13, 2024, Ken Rawls provided multiple records for corrective actions, updated maps, position information regarding open SAA containers, and an updated contingency plan and QRG in an email to Alan Newman.

14) Summary of Observations

Olin failed to close containers excluded solvent contaminated wipes or maintain documentation on how long this waste was being stored in containers on site.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.2 [40 C.F.R. § 261.4(a)(26)(i)], during accumulation, a container is considered closed when there is complete contact between the fitted lid and the rim, except when it is necessary to add or remove solvent-contaminated wipes.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.2 [40 C.F.R. § 261.4(a)(26)(v)(B)], generators must maintain at their site documentation that the 180-day accumulation time limit in 40 CFR 261.4(a)(26)(ii) is being met.

Olin exceeded 55 gallons in multiple SAAs at the site.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)], which is a condition of the SAA Permit Exemption, a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near any point of generation where wastes initially accumulate which is under the control of the operator of the process generating the waste, without a permit or interim status provided that all of the conditions for exemption in this section are met.

Several containers were not in good condition and the waste was not moved to a container in good condition.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(1)], which is a condition of the SAA Permit Exemption, if a container holding hazardous waste is not in good condition, or if it begins to leak, the generator must immediately transfer the hazardous waste from this

container to a container that is in good condition and does not leak, or immediately transfer and manage the waste in a central accumulation area.

Olin failed to keep SAA containers closed and labeled in multiple areas at the site.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a container holding hazardous waste must be closed at all times during accumulation when adding, removing or consolidating waste.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(5)(i-ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its container with the following: (i) the words “Hazardous Waste” and (ii) an indication of the hazards of the contents.

Olin failed to keep CAA containers closed and labeled in multiple areas at the site.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(1)(iv)(A)], which is a condition of the LQG Permit Exemption, a container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the LQG Permit Exemption, a large quantity generator must mark or label its containers with the following: an indication of the hazards of the contents.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(6)] which references 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.251], which is a condition of the LQG Permit Exemption, a large quantity generator must maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(6)] which references 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.252(c)], which is a condition of the LQG Permit Exemption, a large quantity generator may determine the most appropriate locations within its facility to locate equipment necessary to prepare for and respond to emergencies: Portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment.

Several CAA did not have sufficient aisle space.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(6)] which references 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.255], which is a condition of the LQG Permit Exemption, a large quantity generator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(6)], which references 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.261(e)], which is a condition of the LQG Permit Exemption, the contingency plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(6)], which references 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.261(f)], which is a condition of the LQG Permit Exemption, the contingency plan must include an evacuation plan for generator personnel where there is a possibility that evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires).

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(6)], which references 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.262(b)], which is a condition of the LQG Permit Exemption, an LQG that is amending its contingency plan to submit a quick reference guide of the contingency plan to the local emergency responders. The required contents of the quick reference guide are specified in [11 Miss. Admin. Code Pt. 3, R. 1.3] [40 C.F.R. § 262.262(b)]. The quick reference guide must include the following elements (4) A map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; (5) A street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers.

Several emergency coordinators did not have up to date annual training.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(7)(iii)], which is a condition of the LQG Permit Exemption, facility personnel must take part in an annual review of the initial training required in paragraph (a)(7)(i) of this section.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(7)(i)(C)], which is a condition of the LQG Permit Exemption, at a minimum, the training program must be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including where applicable: (1) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment; (2) Key parameters for automatic waste feed cut-off systems; (3) Communications or alarm systems; (4) Response to fires or explosions; (5) Response to ground-water contamination incidents; and (6) Shutdown of operations.

There were small spills of used oil in the Centerfire Progressive Die area and one container that was not labeled as “Used Oil” in the HazMat building.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.22 [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words “Used Oil.”

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.22 [40 C.F.R. § 279.22(d)(3)], generators of used oil upon detection of a release of used oil to the environment must perform the following cleanup steps: (3) Clean up and manage properly the released used oil and other materials.

15) **List of Attachments**

Attachment 1 – Photo Log

16) **Signed**

ALAN NEWMAN

Digitally signed by ALAN NEWMAN
Date: 2024.11.07 11:20:24 -05'00'

Alan Newman
Environmental Engineer

17) **Concurrence**

**RAJAGOPAL
AIYAR**

Digitally signed by RAJAGOPAL
AIYAR
Date: 2024.11.07 11:41:30 -05'00'

for Brooke York
Acting Chief
RCRA Enforcement Section

Appendix 1

Photograph Log:

Photos taken August 29-30, 2024

Photos taken by Alan Newman

Photos taken with: Lumix Digital

EPA Property Tag: S75870



Photograph 1: Excluded Solvent-Contaminated Wipes accumulation container near I-beam E6.



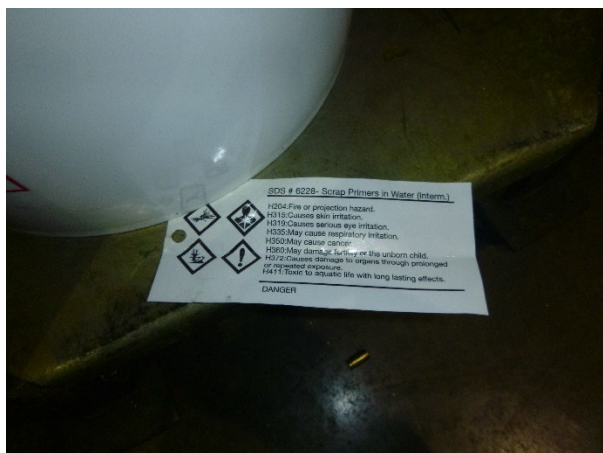
Photograph 3: Used Oil containers and rags.



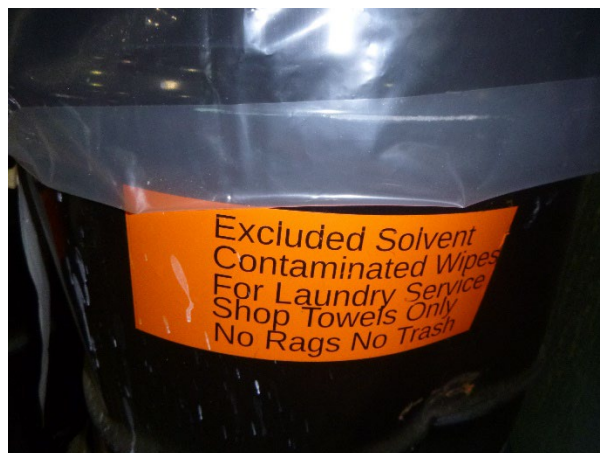
Photograph 2: Used Oil containers.



Photograph 4: Scrap Primer in water accumulation container.



Photograph 5: Scrap primer accumulation container label.



Photograph 8: Capping SAA near Capper 16 machine.



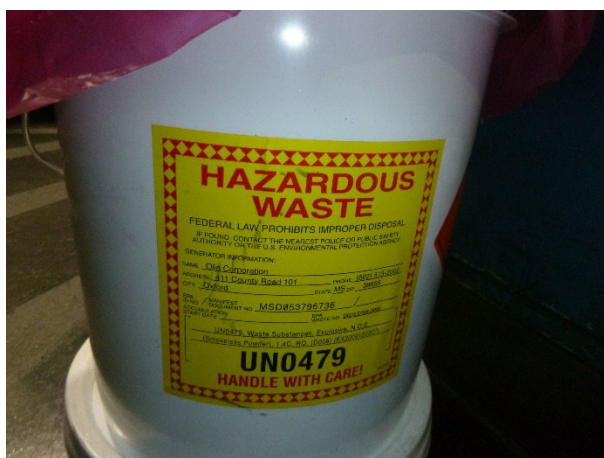
Photograph 6: Capping SAA near Capper 16 machine.



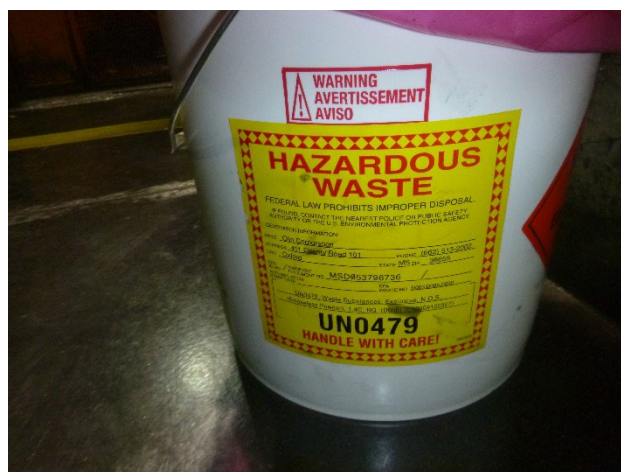
Photograph 7: Capping SAA near Capper 16 machine.



Photograph 9: Loading SAA.



Photograph 10: Loading SAA.



Photograph 12: Quality Station SAA.



Photograph 11: Quality Station SAA.



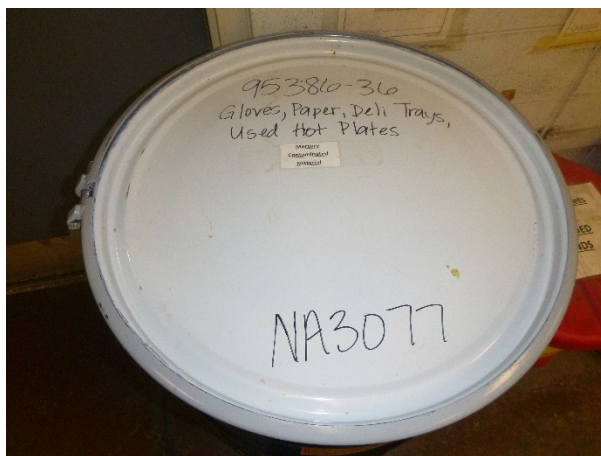
Photograph 13: Mercury Laboratory SAAs.



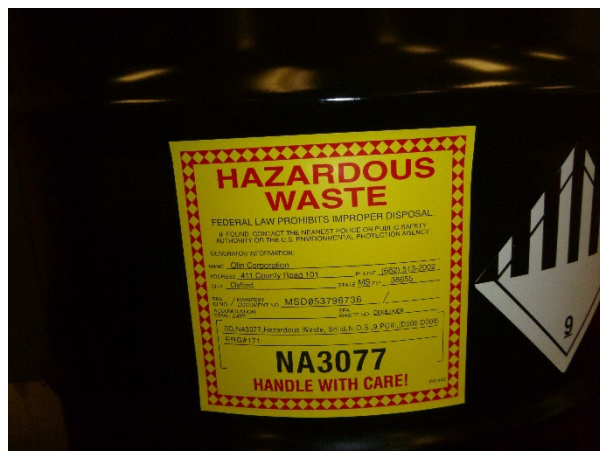
Photograph 14: Mercury Laboratory SAAs.



Photograph 14: Mercury Laboratory SAAs.



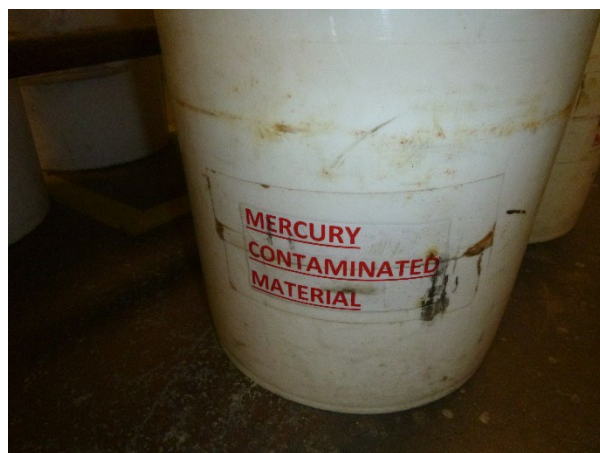
Photograph 15: Mercury Laboratory SAAs.



Photograph 16: Mercury Laboratory SAAs.



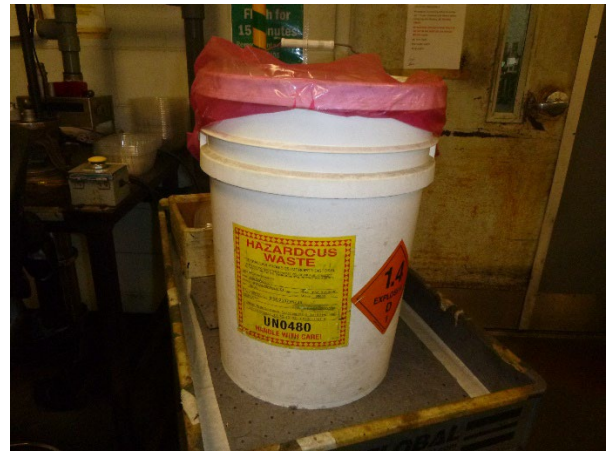
Photograph 17: Mercury Laboratory SAAs.



Photograph 18: Mercury Laboratory SAAs.



Photograph 19: Mercury Laboratory SAAs.



Photograph 22: Mercury Laboratory SAAs.



Photograph 20: Mercury Laboratory SAAs.



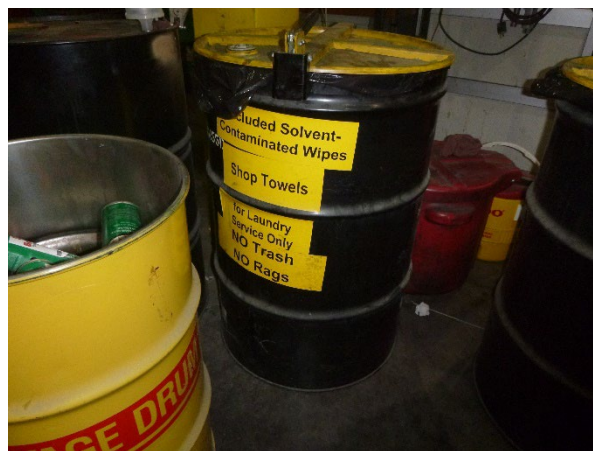
Photograph 21: Mercury Laboratory SAAs.



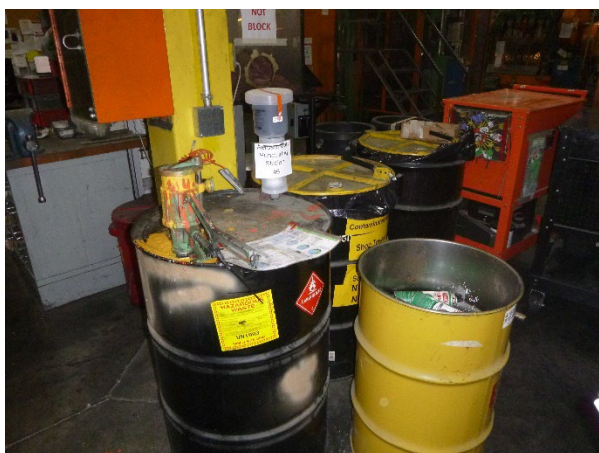
Photograph 23: Mercury Laboratory SAAs.



Photograph 24: Excluded Solvent-Contaminated Wipes accumulation container.



Photograph 27: I-Beam F19 SAAs and wipes accumulation containers.



Photograph 25: I-Beam F19 SAAs and wipes accumulation containers.



Photograph 28: I-Beam F19 SAAs and wipes accumulation containers.



Photograph 26: I-Beam F19 SAAs and wipes accumulation containers.



Photograph 29: I-Beam F19 SAAs and wipes accumulation containers.



Photograph 30: Leadworks 2-03 CAA.



Photograph 33: Leadworks Baghouse SAA.



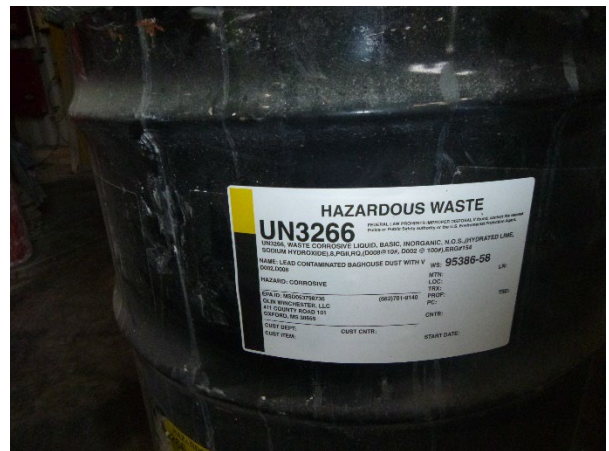
Photograph 31: Leadworks 2-03 CAA.



Photograph 34: Leadworks Baghouse SAA.



Photograph 32: Leadworks 2-03 CAA.



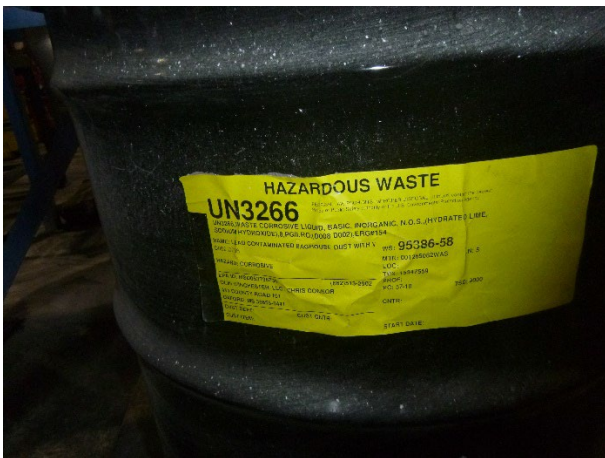
Photograph 35: Leadworks Baghouse SAA.



Photograph 36: Leadworks Baghouse SAA.



Photograph 39: Packing 2-02 CAA.



Photograph 37: Leadworks Baghouse SAA.



Photograph 40: Packing SAA.



Photograph 38: Packing 2-02 CAA.



Photograph 45: HazMat Building 2-05 CAA.



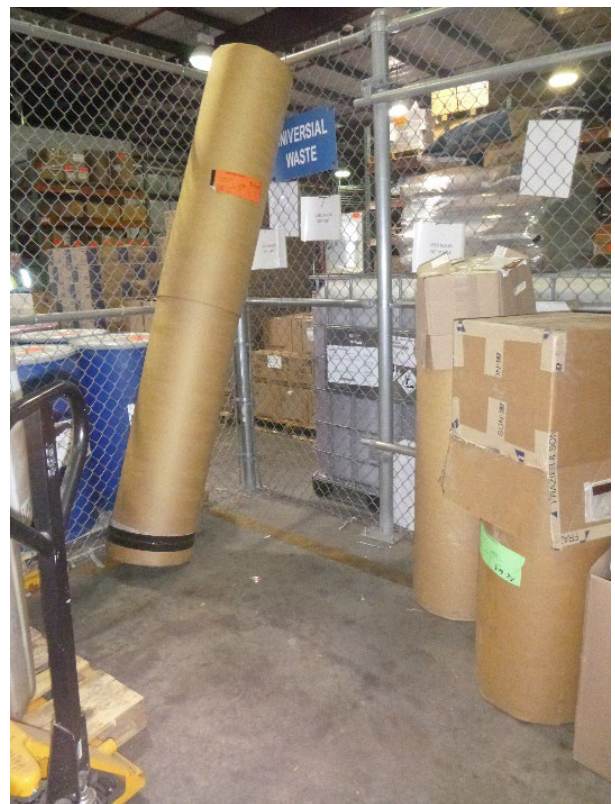
Photograph 48: HazMat Building 2-05 CAA.



Photograph 46: HazMat Building 2-05 CAA.



Photograph 47: HazMat Building 2-05 CAA.



Photograph 49: HazMat Building 2-01 CAA.



Photograph 50: HazMat Building 2-01 CAA.



Photograph 53: HazMat Building 2-01 CAA.



Photograph 51: HazMat Building 2-01 CAA.



Photograph 54: HazMat Building Battery storage area.



Photograph 52: HazMat Building 2-01 CAA.



Photograph 55: Acetone SAA outside Loading.



Photograph 56: Acetone SAA outside Loading.



Photograph 57: Stressed vegetation area from roof drain downspout.



Photograph 58: Rimfire WWTP CAA 1-03.



Photograph 59: Rimfire WWTP CAA 1-03.



Photograph 60: High Explosives SAA.



Photograph 62: Sorting Table in Primer Mix Area and SAA.



Photograph 61: CAA 1-02.



Photograph 63: Salvage containers in Primer Mix Area.



Photograph 64: Primer Mix Area SAA.



Photograph 66: Primer Mix Area SAA.



Photograph 65: Primer Mix Area SAA.



Photograph 67: Primer Mix Area SAA.



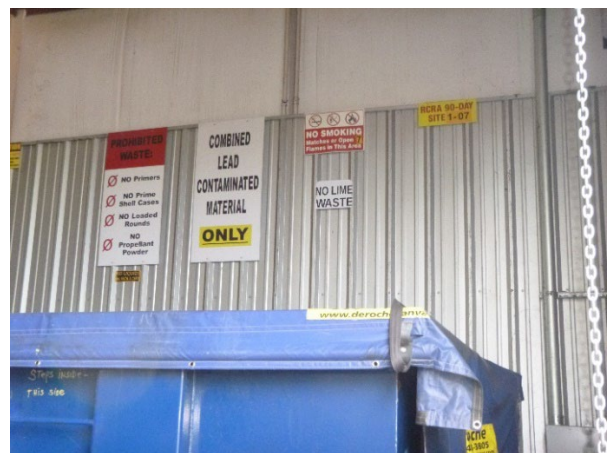
Photograph 68: Primer Mix Area SAA.



Photograph 69: Aerosol can container.



Photograph 70: CAA 1-07.



Photograph 71: CAA 1-07.



Photograph 72: CAA 1-07.



Photograph 73: Waste on floor near CAA 1-07.



Photograph 74: Waste on platform near CAA 1-07.



Photograph 75: CAA 1-05.



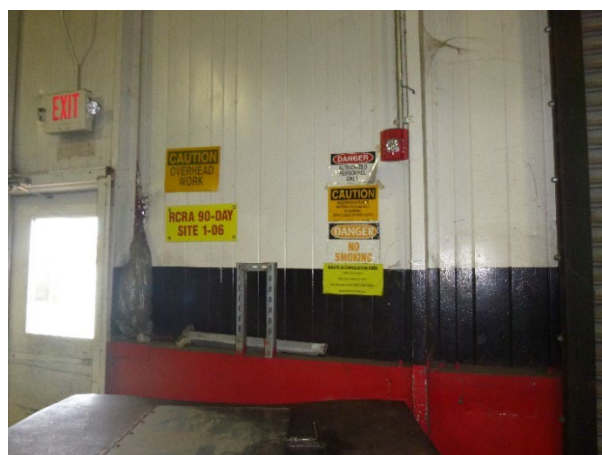
Photograph 76: CAA 1-05.



Photograph 77: CAA 1-05.



Photograph 78: CAA 1-05.



Photograph 81: CAA 1-06.



Photograph 79: CAA 1-05.



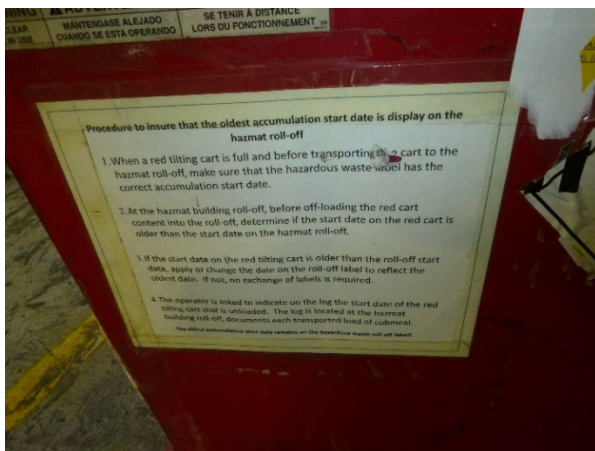
Photograph 82: CAA 1-06.



Photograph 80: CAA 1-05.



Photograph 83: CAA 1-06.



Photograph 84: CAA 1-06.



Photograph 87: CAA 1-01.



Photograph 85: MPU near CAA 1-06.



Photograph 86: CAA 1-01.